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13
14 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

15 **In re:**

16 **PG&E CORPORATION**

17 **-and-**

18 **PACIFIC GAS AND ELECTRIC
COMPANY,**

20 **Debtors**

- 21
22 Affects PG&E Corporation
23 Affects Pacific Gas and Electric Company
24 Affects both Debtors

25
26 *All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

27
28 **DECLARATION OF KIRK TROSTLE
IN SUPPORT OF OFFICIAL
COMMITTEE OF TORT CLAIMANTS'
LIMITED JOINDER, OBJECTION AND
COUNTER MOTION TO DEBTORS'
WILDFIRE ASSISTANCE PROGRAM
MOTION (DKT. NO. 1777)**

Date: May 22, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 || I, Kirk Trostle, declare:

2 1. I have personal knowledge of the facts set forth in this declaration and if called to
3 testify could and would competently testify thereto.

4 2. I lived in Paradise, California, for 30 years before the Camp Fire destroyed the town
5 and neighboring communities. The fire destroyed my home and possessions as well as the homes
6 and possessions of 25 of my family members. My daughter was almost killed by the fire; she said
7 "Good-bye" to my wife and me on the phone.

8 3. Before the fire, I served in law enforcement for 27 years, including as Chief of
9 Police for the City of Chico and as Chief of Police for the City of Oroville. Both cities are near to
10 the now-destroyed Town of Paradise.

11 4. My wife and I have been displaced to Anderson, California, which is an hour and a
12 half drive from Paradise. Nonetheless, I have visited Paradise many times since the fire and have
13 kept in touch with many former residents in person, on the phone, and by social media.

14 5. There is a large number of victims of the Camp Fire who urgently need help to get
15 on their feet. Many are in temporary housing – travel trailers, tents, couch surfing, rented rooms,
16 relatives' homes, motels, and the like.

17 6. I understand the Debtors' Wildfire Assistance Program Motion seeks \$105 million
18 to help provide for the urgent needs of fire victims. It is imperative an urgent needs fund be
19 sufficient to actually provide for the urgent needs of all of the thousands of fire victims who have
20 such need. Promising but underfunding an urgent needs fund will only add injury to injury for those
21 who already have suffered so much, been given hope of help in the form of an urgent needs fund,
22 and then denied assistance because of underfunding.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
24 day of May 15, 2019, at Anderson, California.

Kirk Trostle